

# EXHIBIT 3

1 UNITED STATES DISTRICT COURT  
2 EASTERN DISTRICT OF CALIFORNIA

3

4 MATTHEW PETERSON, SADIE FLODING, )  
COLIN STRUB, CARSON BRENDA, JODY )  
5 BARRY, TEISCHA BENSON, LYNNETTA )  
KLAM, and LORI DAVIES, )

6

Plaintiffs, )

7

vs. )

8

THOMSON INTERNATIONAL, )  
9 INCORPORATED, a California )  
corporation; DOES 1-10, )  
10 inclusive; and ROE ENTITIES 1-10, )  
inclusive, )

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Defendants. )

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REMOTE DEPOSITION OF TEISCHA BENSON

17

Pages 1 - 42

18

Wednesday, January 10, 2024

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23 Stenographically and Remotely Reported By:  
Sarah Goekler, RMR, CRR, CCRR  
24 CA CSR No. 13446

25

File No. 978332

**CERTIFIED  
TRANSCRIPT**

No. 1:22-CV-00701  
JLT-CDB

1 Wednesday, January 10, 2024 10:01 a.m.

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3 TEISCHA BENSON,

4 having first been remotely sworn by a Certified  
5 Shorthand Reporter for the State of California, was  
6 examined and testified as follows:

7 EXAMINATION

8 BY MS. CHEN:

9 Q. Good morning, Ms. Benson. My name is  
10 Helen Chen. I represent defendant Thomson  
11 International, Inc., in this case.

12 Could you please state your full name for the  
13 record?

14 A. Teischa Marie Benson.

15 Q. What's your date of birth?

16 A. 7/30/88.

17 Q. Do you have a preferred pronoun?

18 A. No.

19 Q. The oath which you have just taken is the same  
20 oath you will take in a court of law. The testimony  
21 that you give today has the same force and effect as if  
22 you are testifying in court.

23 The oath requires that you tell the truth, and  
24 if you fail to do so, you can be subject to penalties  
25 for perjury. You must answer all of my questions

1           A.    I think, like, other vegetables.  I'm not too  
2    sure.

3           **Q.    What are you suing Thomson for?**

4           MS. LIEN:  Objection --

5           THE WITNESS:  The Salmonella outbreak.

6           MS. LIEN:  I was just going to object to the  
7    foundation.

8           It's okay, Teischa.

9           THE WITNESS:  Do I say?

10   BY MS. CHEN:

11          **Q.    Yeah, go ahead with your testimony.**

12          A.    For getting Salmonella.

13          **Q.    When did you get Salmonella?**

14          A.    July of 2020.

15          **Q.    Who told you that you got Salmonella?**

16          A.    My hospital.

17          **Q.    Which hospital was -- yeah, go ahead.**

18          A.    Great Falls Clinic.

19          **Q.    When did you go to Great Falls Clinic?**

20          A.    When?

21          **Q.    Yeah.**

22          A.    I don't recall that date specifically.  I just  
23    remember that it was in July.

24          **Q.    July of 2020?**

25          A.    Yes.

1           **Q.    What prompted you to go to Great Falls Clinic**  
2   **in July 2020?**

3           A.    I was having really bad diarrhea, bad stomach  
4   cramps that I couldn't -- that they just hurt really  
5   bad, and I didn't feel like -- I felt something was  
6   wrong, and so me and my husband -- well, actually my  
7   husband made me go to the hospital because of how bad I  
8   was feeling. And so we went to the hospital, and they  
9   just checked me there.

10          **Q.    Did you go to the hospital the first day you**  
11   **had diarrhea?**

12          A.    Yes. I believe so.

13          **Q.    Do you remember whether that day was a weekday**  
14   **or a weekend?**

15          A.    It was a weekday.

16          **Q.    When you say you had bad diarrhea, can you**  
17   **describe to me how many diarrheas you had that day?**

18          A.    All day, probably like six, seven, and it  
19   was -- yeah. Six or seven.

20          **Q.    What did you do when you arrived in the**  
21   **hospital?**

22          A.    What did I do when I arrived?

23          **Q.    Yes.**

24          A.    Just checked in and let them know my symptoms.

25          **Q.    Do you remember which doctor treated you?**

1 A. No, I don't.

2 Q. Did you visit the hospital's emergency room,  
3 or did you just visit a regular clinic?

4 A. It was the emergency room.

5 Q. Did the doctor prescribe any tests for you?

6 A. Yes.

7 Q. Could you describe the test?

8 A. It was -- I don't know what they're called,  
9 but it was just that I needed to poop in a hat.

10 Q. Anything else?

11 A. And I think they ran a pee test on me and  
12 maybe some blood work.

13 Q. I cannot hear the first test. They ran a what  
14 test on you?

15 A. A poop test.

16 Q. Yes. I heard that one. And the next one is?

17 A. I think they might have done a urine test on  
18 me too and a blood test.

19 Q. Did the result come back on that date?

20 A. I don't remember.

21 Q. Did the results ever come back?

22 A. Yes, they did. They -- yeah, they did come  
23 back when I was there, and it came back positive for  
24 Salmonella.

25 Q. Which result came back positive for

1     **Salmonella?**

2           A.    The poop test.

3           Q.    Did the doctor prescribe any medications for  
4     you?

5           A.    No.

6           Q.    Did you take any medications for diarrhea?

7           A.    I don't recall, no.

8           Q.    Did you take any medications for your illness  
9     in July 2020?

10          A.    No.

11          Q.    How long were you in the hospital?

12          A.    Probably a few hours.

13          Q.    Who took you home after the hospital?

14          A.    My husband.

15          Q.    The day after you came back from hospital,  
16     what happened?

17          A.    The day after? I was still sick. I just had  
18     the diarrhea and the little -- my cramps subsided, and I  
19     was sick still.

20          Q.    What about diarrhea on the second day?

21          A.    Yes, I had diarrhea still for the second day.  
22     I don't think as much, but I did.

23          Q.    Did your symptoms resolve in July 2020?

24          A.    Yes.

25          Q.    How many days after your release from hospital

1 Great Falls Health Department is not Bowen Trystianson;  
2 right?

3 A. I don't think so, but I don't know.

4 Q. What did you tell Great Falls Health  
5 Department when they interviewed you?

6 A. I don't recall. I think they just asked me  
7 questions, but I don't remember.

8 Q. What kind of question did they ask you?

9 A. Like where I've ate at, if I knew exactly,  
10 like, what I ate, I think. I think that was it.

11 Q. Did you seek psychological care for your  
12 illness in July 2020?

13 A. No.

14 Q. Are you seeking psychological care damages in  
15 this lawsuit?

16 A. No.

17 Q. Are you seeking emotional distress damages in  
18 this lawsuit?

19 A. Yes.

20 Q. Could you describe your emotional distress?

21 A. Just that I was sick and I couldn't do the  
22 activities that I normally did, and it was pretty  
23 painful.

24 Q. Did you seek any medical, psychological, or  
25 psychiatric care for your emotional distress?